

**Louise A. Knight
3610 Logan Court
Unit 3B
Camp Hill, PA 17011
Telephone: 717-919-4087**

October 21, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

In Re: Indian Springs Water Company; Docket No. M-2019-3011972

**PETITION OF GLEN SUMMIT COMPANY AND NOTICE OF
APPEARANCE OF LOUISE A. KNIGHT**

Dear Secretary Chiavetta;

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition of Glen Summit Company to Intervene in the above-captioned matter and the Notice of Appearance of Louise A. Knight on behalf of same.

A copy of this document has been served in accordance with the attached Certificate of Service. Should you have any questions or comments, please feel free to call me. Thank you for your attention to this matter.

Sincerely,


Louise A. Knight
Counsel for *Glen Summit Company*

LAK
Enclosures
Service per Certificate of Service

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FRONT DESK

2019 OCT 21 PM 2:00

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. M-2019-3011972
	:	
The Indian Springs Water Company	:	

PETITION OF THE GLEN SUMMIT COMPANY TO INTERVENE

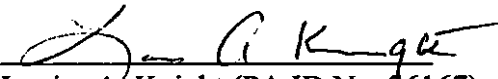
The Glen Summit Company (hereafter “Glen Summit Company”) hereby petitions to intervene in the above-captioned proceeding and, in support thereof, represents as follows:

1. Glen Summit Company is an entity that is owned, for the most part, by the residents and long-term lessees of a community known as Glen Summit (“Glen Summit”), located in Fairview Township, Luzerne County, Pennsylvania. Glen Summit Company also serves the functions of a home owners’ association for Glen Summit. Some of the residents of Glen Summit are also shareholders of The Indian Springs Water Company (“Indian Springs”), which is the subject of the above-captioned proceeding. Glen Summit Company also owns the private roads through which some of Indian Springs’ water distribution system runs.
2. All current and former customers of Indian Springs are Glen Summit residents. Indian Springs exclusively serves the Glen Summit community.
3. The public and private rights-of-way throughout Glen Summit that accommodate Indian Springs’ water distribution system also accommodate the sewer collection system of The Mountaintop Area Joint Sewer Authority (“MAJSA”), which has an interest in replacing that collection system.
4. By order adopted and entered on August 8, 2019, the Pennsylvania Public Utility Commission’s (“PAPUC”) opened what is known as a Section 529 proceeding. The purpose of a Section 529 proceeding is to find an alternative to the water service then provided by Indian Springs, due to what are alleged to be health and safety violations. Although Section 529 primarily envisions the purchase of the water company by a viable entity, Subsection 529(b) also provides for the utility to have a reasonable opportunity to investigate alternatives to acquisition.

5. By practice, customers of Section 529 targets are given notice of the proceeding and invited to intervene in the proceeding. In this case, that letter was sent to customer in early October, 2019 with a deadline of October 21, 2019 to file petitions to intervene.
6. Glen Summit Company submits that it should be allowed to intervene because it constitutes the local homeowners' association and is the most efficient manner for customers of Indian Springs and Glen Summit residents to be represented in this matter. It not only has an interest in the future of Indian Springs but also the local sewer system, which may be affected by whatever happens to Indian Springs' physical assets, since they share common easements. Finally, Glen Summit Company submits that it has unique knowledge of alternatives that its members are engaging in, which may allow the parties to this proceeding to find an alternative to acquisition as contemplated in Section 529(b).

WHEREFORE, Glen Summit Company prays that it be granted intervention status in the above-captioned matter.

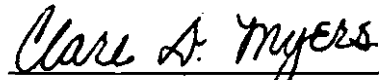
Respectfully submitted,


Louise A. Knight (PA ID No. 26167)
3610 Logan Court
Unite 3B
Camp Hill, PA 17011
Telephone: 717-919-4087
E-mail: attylknight@gmail.com
Counsel for Glen Summit Company

October 21, 2019

VERIFICATION

I, Clare Myers, President of The Glen Summit Company, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Clare D. Myers, President
The Glen Summit Company

Date: October 21, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

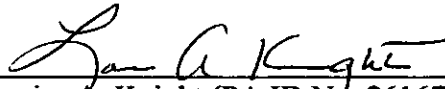
The Indian Springs Water Company

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Docket No. M-2019-3011972

NOTICE OF APPEARANCE

Please enter the appearance of the undersigned counsel in the above-captioned matter on behalf of Glen Summit Company. On the basis of this notice, I am requesting an electronic copy of each document issued by the Commission or served by a party in this matter.



Louise A. Knight (PA ID No. 26167)
3610 Logan Court
Unite 3B
Camp Hill, PA 17011
Telephone: 717-919-4087
E-mail: attylknight@gmail.com
Counsel for Glen Summit Company

Dated: October 21, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. M-2019-3011972
	:	
The Indian Springs Water Company	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Notice of Appearance of Louise A. Knight on behalf of Glen Summit Company and Its Petition to Intervene** in the above-captioned proceeding, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

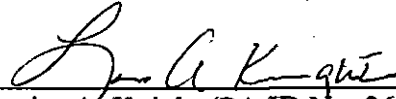
Honorable Steven K. Haas
Office of Administrative Law Judges
Pennsylvania Public Utility Commission
400 North Street, 2nd floor West
Harrisburg, PA 17120
E-mail: sthaas@pa.gov

Keystone Building
Harrisburg, PA 17120
sgranger@pa.gov

Christine Maloni Hoover
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Email: choover@paoca.org

Elizabeth Rose Triscari, Esquire
Pennsylvania-American Water
582 Wesley Drive
Mechanicsburg, PA 17055
elizabeth.triscari@amwater.com

Scott B. Granger, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2 West



Louise A. Knight (PA ID No. 26167)
Counsel for Glen Summit Company

Date: October 21, 2019